

**SAMPLE BANK
OFAC OVERALL BANK RISK ASSESSMENT**

| RISK FACTOR | High = 3 | Moderate = 2 | Low = 1 | Bank's Score |
|--|-----------------|---------------------|----------------|---------------------|
| Stable known local customer base (low), customer base increasing due to branching, merger or acquisition domestically (moderate), or large and growing customer base in an international environment (high) | | | | |
| Number of high-risk customers (nonresident aliens, foreign customers, foreign commercial customers, etc.) | | | | |
| Overseas branches or correspondent accounts with foreign banks | | | | |
| Commercial customers originating ACH transaction with little or no international activity (moderate) or commercial customers originating ACH transactions with international activity (high) | | | | |
| No e-banking or web site non-transactional (low), the bank offers limited e-banking products and services (moderate), or a wide array of e-banking products and services (high) | | | | |
| Limited funds transfers for customers and no international transfers (low), moderate funds transfers for customers with few international transfers (moderate), high number of domestic transfers for both customers and non-customers as well as international transfers (high) | | | | |
| Other types of international transactions such as trade finance, cross border ACH and management of sovereign debt | | | | |
| History of OFAC actions (notice letters, civil money penalties etc.) | | | | |
| Total Bank Score | | | | |
| Scoring: High Risk = Greater than 15 Moderate Risk = Greater than 8 but 15 or less Low Risk = 8 or less | | | | |